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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 RYAN KEITH TYLER,
15 Defendant.

Case No. 2:21-cr-00121-RFB-VCF

STIPULATION TO MODIFY
CONDITIONS OF RELEASE
(First Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,
18 Acting United States Attorney, and Supriya Prasad, Assistant United States Attorney, counsel
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Paul
20 D. Riddle, Assistant Federal Public Defender, counsel for Ryan Keith Tyler, that the Court
21 modify his conditions of release to allow him to access a cell phone for employment purposes
22 only.

23 The Stipulation is entered into for the following reasons:

24 1. Condition #26 of the current terms of pretrial release require Mr. Tyler to seek
25 and maintain lawful employment.
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2. Condition # 55 of the current terms of pretrial release restrict Ms. Tyler's access to computers and other devices which connect to the internet.

3. Mr. Tyler has recently been offered employment with MyLife Healthy Services. However, as a condition of employment, Mr. Tyler must have access to a company app and therefore must be able to connect to the internet through his cell phone.

4. The parties hereby stipulate and agree that Mr. Tyler be permitted to use his cell phone (modification to condition number 55); that the permission be for work purposes only (condition 56); that his cell phone be subject to an initial and then periodic searches (conditions 57 and 59); and that pre-trial services be allowed to upload monitoring software to Mr. Tyler's cell phone (condition 58).

5. Mr. Tyler's Pre-trial officer, Jennifer Simone, has been consulted and has no objection to these modifications.

This is the first stipulation to modify conditions of release filed herein.

DATED this 20th day of July, 2021.

RENE L. VALLADARES
Federal Public Defender

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Paul D. Riddle
By _____

/s/ Supriya Prasad
By _____

PAUL D. RIDDLE
Assistant Federal Public Defender

SUPRIYA PRASAD
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,
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5 Plaintiff,
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7 v.
8 RYAN KEITH TYLER,
9 Defendant.

Case No. 2:21-cr-00121-RFB-VCF
ORDER

9 Based on the pending Stipulation of counsel, and good cause appearing,

10 IT IS THEREFORE ORDERED that the conditions of pretrial release are modified to
11 allow Mr. Tyler to use a cell phone for work purposes subject to the other conditions outlined
12 in this attached stipulation.
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14 DATED this 20th day of July, 2021.

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16 RICHARD F. BOULWARE, II
17 UNITED STATES DISTRICT JUDGE
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